

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JEFFERY C. ARCHANGEL,	§
<i>Plaintiff,</i>	§
	§
v.	§ CIVIL ACTION NO. 4:24-CV-03436
	§
CITY OF HOUSTON, TEXAS;	§
DAVID J. CROWDER; and	§
ALEXANDER S. VINOGRADOV	§
<i>Defendants.</i>	§

AGREED MOTION TO EXTEND DEADLINES
AND CONTINUE THE INITIAL PRETRIAL
AND SCHEDULING CONFERENCE

TO THE HONORABLE ALFRED H. BENNETT:

NOW COMES Plaintiff Jeffery C. Archangel and Defendants, the City of Houston, David Crowder, and Alexander Vinogradov, and file this *agreed* motion to extend deadlines for responses by both parties as well as continue the initial pretrial and scheduling conference until a date convenient for the Court in February 2025, and would show the following:

PROCEDURAL HISTORY

Plaintiff filed his original complaint on September 13, 2024.

Defendant City of Houston filed motions to dismiss on October 11, 2024.

Defendant David Crowder filed his motion to dismiss on October 14, 2024.

Defendant Alexander Vinogradov filed his motion to dismiss on November 19, 2024.

Plaintiff filed an amended complaint on November 25, 2024.

An initial pretrial and scheduling conference is scheduled before Magistrate Judge Peter Bray for December 6, 2024, at 10:00 a.m.

FACTS AND ARGUMENT

Plaintiff requests until December 20, 2024, to respond to the motions to dismiss filed by Defendants. The issues in the instant case are complex and involve *Monell* liability. Additionally, Plaintiff's counsel has been very busy of late with briefing and motions practice and is preparing for trial in the Southern District of Texas. No prejudice will result from allowing an extension of time for Plaintiff to respond to the motions to dismiss, and Plaintiff's request for an extension is not for delay only but to see that justice is done. Defendants request until January 8, 2025 to file replies to Plaintiff's responses to the motions to dismiss. And, in the interest of judicial efficiency and assuming that the above-outlined requests to extend response deadlines are granted, the parties request that the initial pretrial and scheduling conference be continued to a date in February 2025.

CONCLUSION AND PRAYER

The parties respectfully request that their motion be granted, that the deadlines for filing responses and replies be extended, and that the initial pretrial and scheduling conference be continued to February 2025.

Date: November 26, 2024

Respectfully submitted,

Reynal Law Firm, PC

By: /s/ F. Andino Reynal

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Attorneys for Defendants City of Houston
David J. Crowder, and
Alexander Vinogradov

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for Defendants, Melissa Azadeh (Melissa.Azadeh@houstontx.gov), by email on November 25, 2024, and she is in agreement with the instant motion.

/s/F. Andino Reynal
F. Andino Reynal

CERTIFICATE OF SERVICE

I certify that on this 25th day of November 2024, a true and correct copy of the foregoing pleading was delivered in accordance with the Federal Rules of Civil Procedure to all ECF notice attorneys of record by filing with the Court.

/s/F. Andino Reynal
F. Andino Reynal

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<i>Defendants.</i>	§

ORDER

On this day came to be considered the parties' Agreed Motion for Extensions of Response Deadlines and Request for Continuance of the Initial Pretrial and Scheduling Conference, and the motion is GRANTED.

THE FOLLOWING IS ORDERED:

Plaintiff's deadline to respond to Defendants' motions to dismiss is extended to December 20, 2024;

Defendants' deadline to respond to Plaintiff's responses to Defendant's motions to dismiss is extended to January 8, 2025; and

the initial pretrial and scheduling conference is continued until a time convenient for the Court in February 2025.

SIGNED on _____ at Houston, Texas.

UNITED STATES DISTRICT JUDGE